

Brian J. Lord
3824 SW Myrtle St.
Seattle, WA. 98126-3210

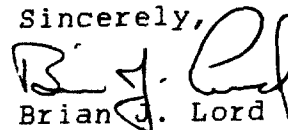
March 17, 1995

Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Sir:

Would you please send me an acknowledgement card with my file number on it for this application I am submitting herein.

Sincerely,


Brian J. Lord

Enclosures

RECEIVED

MAR 27 1995

FCC MAIL ROOM

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D. C. 20554

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In the Matter of)
Amendment of Section 73.202 (B))
Table of Allotments)
FM Broadcast Stations)
CLE ELUM, WASHINGTON)

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TO: The Chief, Allocations Branch

MAR 27 1995

Proposal

FCC MAIL ROOM

1. Brian J. Lord hereby respectfully requests the assignment of FM Channel 229A to the City of Cle Elum, Washington as its first local service and first full-time FM service.

2. If this channel assignment is approved, the table of allotments would be changed to read as follows:

CITY	EXISTING CHANNEL	PROPOSED CHANNEL
CLE ELUM, WA.	NONE	229A

3. An engineering statement supporting Brian J. Lord's proposal showing compliance with the FCC's spacing requirements is attached. Canadian concurrence for the allotment to Cle Elum must be obtained as it is within 320 kilometers (200 miles) from the U.S.-Canadian border.

4. Brian J. Lord hereby states his intention to apply for a construction permit for Channel 229A if it is allotted to Cle Elum, and, if granted, to build and operate the station on that channel.

5. MM Docket # 93-221 RM-8625 proposed to allocate Channel 229C2 to the City of E. Wenatchee, WA. and delete the instant Channel 230C2 allotment from the City of Ephrata, WA. FCC action taken on February 2, 1995 granted the instant application of TRMR, Inc. for Channel 230C2 at Ephrata, WA. (File No. BPH-930721MC). The grant of Channel 230C2 at Ephrata will prevent the allocation of Channel 229C2 at E. Wenatchee, WA. as the cities are approximately 35 miles apart.

6. I filed a counter-proposal in the rulemaking proceeding #93-221 RM-8625 seeking to assign Channel 229C3 to the City of Cle Elum instead of E. Wenatchee. Now that E. Wenatchee cannot be assigned Channel 229C2 because of short-spacing, it frees up Channel 229A for assignment at Cle Elum.

7. I just received notice that KBSN, Moses Lake, WA. has appealed the FCC action which granted TRMR's application for Ch. 230C2 at Ephrata. If that grant is overturned by Commission action, I would ask that my original counter-proposed rulemaking seeking to allocate Ch. 229C3 at Cle Elum as its first aural service be considered as preferable over the request to add Ch. 229C2 at E. Wenatchee, WA. as its second FM as mentioned in #6 above. In other words, I would prefer a C3 allocation, but if the Commission does not overturn the award of a construction permit to TRMR, Inc. at Ephrata, WA. on Ch. 230C2, I would appreciate your consideration of my request to allocate Ch. 229A at Cle Elum, WA.

8. Brian J. Lord states that to the best of his knowledge all of the above statements are true.

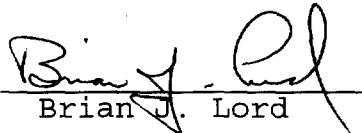
Wherefore, in light of the foregoing, Brian J. Lord respectfully requests that the Commission amend the FM Table of Allotments to assign Channel 229A to the City of Cle Elum, Washington.

Please address any communication regarding this Petition to:

Brian J. Lord
3824 SW Myrtle St.
Seattle, Washington 98126-3210
Phone 206-932-4839

Please note that the above address is a change from where I lived when I submitted my counter-proposed rulemaking in #93-221, RM-8625.

Respectfully submitted

By 
Brian J. Lord

March 17, 1995

ENGINEERING EXHIBITS
IN SUPPORT FOR
ALLOTMENT OF FM CHANNEL 229A
TO CLE ELUM, WASHINGTON

Mr. BRIAN J. LORD
(Petitioner)

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KENNETH WILLIAMS, Jr., P.E.
Consulting Engineer
P.O. BOX 7703
Tacoma, Washington 98407
(206) 756-7544 FAX (206) 752-5145

ENGINEERING STATEMENT IN SUPPORT OF
A PROPOSAL TO ADD FM CHANNEL 229A
TO CLE ELUM, WASHINGTON

Mr. BRIAN J. LORD, (Petitioner)

The following Engineering data supports a request of Mr. Brian J. Lord to amend the FM table of Allotment in Section 73.202(b) of the Commission's Rules. We are requesting channel 229A be added to the FM Table of Allotments as a drop in channel, to Cle Elum, Washington.

The addition of FM channel 229A may be made as a drop in channel, without other channels being moved, deleted or changed.

All distance figures used in this report are metric and calculations were made using methods specified in Section 73.208 of the FCC Rules. All distances were in reference to the restricted site coordinates, Southeast of Cle Elum, Washington.

A complete class A channel study is shown as attached Figure 1 and Figure 2. All channel spacings in these figures are within the Commission's current minimum separation requirements at the petitioner's proposed transmitter and antenna site.

With the use of a restricted site Southeast of Cle Elum, Washington an Allotment of channel 229A may be made to Cle Elum, Washington.^{1/}

The site would place Cle Elum, within the 70 DBU contour, as shown in Figure 5, and will not cause short spacing to existing or proposed stations in the U.S. or Canada.

^{1/} Restricted Site Coordinates: N. 47°07'36" W. 120°50'41"

ENGINEERING STATEMENT Cont.

The proposed service contours of 70 and 60 DBU, were drawn by a plotter driven with the tabulated data shown in Figure 6. Average terrain for the site was determined by the NGDC 30-second data base for the Coordinates of the restricted site. The data shown on Figure 3 are the values of antenna center above mean sea level, average terrain of site and station ERP which were used to construct the coverage map of Figure 5.

Attached Figure 4, shows the area to which the allotment could be made without short spacing to other stations. For the purpose of this petition a ground elevation of 3200 feet (975 meters) was used for the site.

Based in the data at hand it appears channel 229A may be allotted to Cle Elum, Washington that community's first local FM service.

ENGINEERS CERTIFICATION

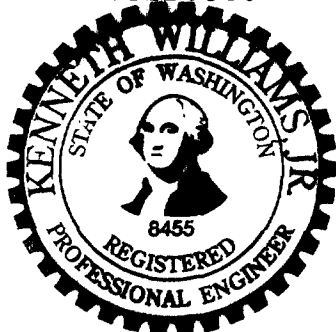
STATE OF WASHINGTON)

) ss

COUNTY OF PIERCE)

Kenneth Williams, Jr., P.E., being duly sworn on his oath, states that he is an experienced and qualified Radio Engineer, licensed as a Registered Professional Electrical Engineer in the States of Washington and Oregon and as such maintains an office for the practice of Electrical and Communications Engineering. Having been in continuous practice as a Consulting Engineer for over 31 years, his qualifications are thus a matter of record with the Federal Communications Commission and the Federal Aviation Administration.

The Engineering data herein, was prepared by him or under his direct supervision and all representation of fact contained in said report is based on affiants measurements, information and belief and he believes all such statements herein to be true and correct.



Kenneth Williams, Jr. PE.
(Kenneth Williams, Jr., P.E.)
(affiant)

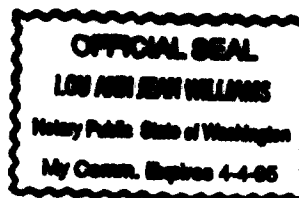
ENGINEERS STATE SEAL

EXPIRES: 7-15-95

Sworn to before me, Lawrence J. Williams a
Notary Public of Tacoma, Washington, on this 20th
day of March, 1995.

My Commission Expires April 4, 1995.

NOTARY STATE SEAL:



BRIAN J. LORD - CLE ELUM, WA - CHANNEL 229A - EXHIBIT No. 1

CLASS A FM CHANNEL STUDY

** CHANNEL 229 **

REFERENCE SITE - CLE ELUM, WA N. 47 7 36 W. 120 50 41

Channel Data Call City State File No. Az-Deg D-Km. R-Km. [Km.MARGIN]

226A	FA	Princeton	BC		4.8	261.4	54	207.4	Clear
226C2	FA VAC	Omak	WA		33.7	164.2	55	109.2	Clear
227C	FM LIC KUBE	Seattle	WA	BLH831004AF	295.9	106.1	95	11.1	Clear
227C1	FM LIC KTELFM	Walla Walla	WA	BLH911202KA	121.7	240.6	75	165.6	Clear
228A	FR DEL	Chelan	WA	RMB265	42.3	109.0	72	37.0	Clear
228A	FM LIC KOZIFM	Chelan	WA	BMLH910204KE	42.3	109.0	72	37.0	Clear
229C	FM LIC KPDQFM	Portland	OR	BLH900828KD	218.0	231.1	226	5.1	Clear
230C2	FM APP NEW	Ephrata	WA	BPH930721MC	76.1	106.3	106	0.3	Clear
231C	FM LIC KMPSEFM	Seattle	WA	BLH890912KB	296.2	95.1	95	0.1	Clear
231A	FM	CBYRFM	Rock Creek	BC	33.0	253.7	62	191.7	Clear
232A	FM LIC KKEE	Long Beach	WA	BLH880401KC	249.8	261.2	31	230.2	Clear

Current Rules Spacing

>>>>> END OF CHANNEL 229 SEARCH <<<<<<

KENNETH WILLIAMS, JR. P.E. - Consulting Engineer - Tacoma, WA

BRIAN J. LORD - CLE ELUM, WA - CHANNEL 229A - EXHIBIT No. 2

DISTANCE TO CHANNELS 10.6-10.8 MHz SPACINGS

FM WITHIN 200 km
 ** CHANNELS 282 TO 283 **

REFERENCE SITE - CLE ELUM, WA				N. 47 7 36		W. 120 50 41	
CHANNEL	CALL	Owner/Applicant		(m)	(kw)	(m)	
& CLASS	STATUS	CITY	Horz->AHAAT/ERP/AMSL	LATITUDE	(deg)	(km)	
		STATE	FILE No.	Vert->AHAAT/ERP/AMSL	LONGITUDE	AZIMUTH	DIST
104.3 Mhz.		Onak Community Broadcasters					
282 C2		Onak		48-15-44	37.9	160.1	
FR	ADD	WA	RM 8404	119-31-58			
104.5 Mhz.		Mercer Island School District #400					
283 A	KMIH	Mercer Island	69 3.0 132	47-34-21	295.6	114.7	
FM	APP	WA	BPED 940712MA	69 3.0 132	122-12-55		
104.5 Mhz.		Mercer Island School District #400					
283 A		Mercer Island		47-34-21	295.6	114.7	
FA	VACA	WA		122-12-55			
104.5 Mhz.		Mercer Island School District #400					
283 D	KMIH	Mercer Island	71 .014 134	47-34-19	295.6	114.7	
FM	LIC	WA	BLED 930401KA	122-12-55			
104.5 Mhz.		Mid Columbia Broadcasting, Inc.					
283 C	KMOQ	The Dalles	610 100. 998	45-42-41	187.6	158.7	
FM	LIC	OR	BLH 850916KS	610 100. 998	121- 7- 7		

>> END OF FM WITHIN 200 km STUDY <<

KENNETH WILLIAMS, JR. P.E. - Consulting Engineer - Tacoma, WA

TERRAIN ELEVATION INFORMATION

NGDC 30-SECOND DATA

FROM SITE AT:

N. 47° 07' 36"

W. 120° 50' 41"

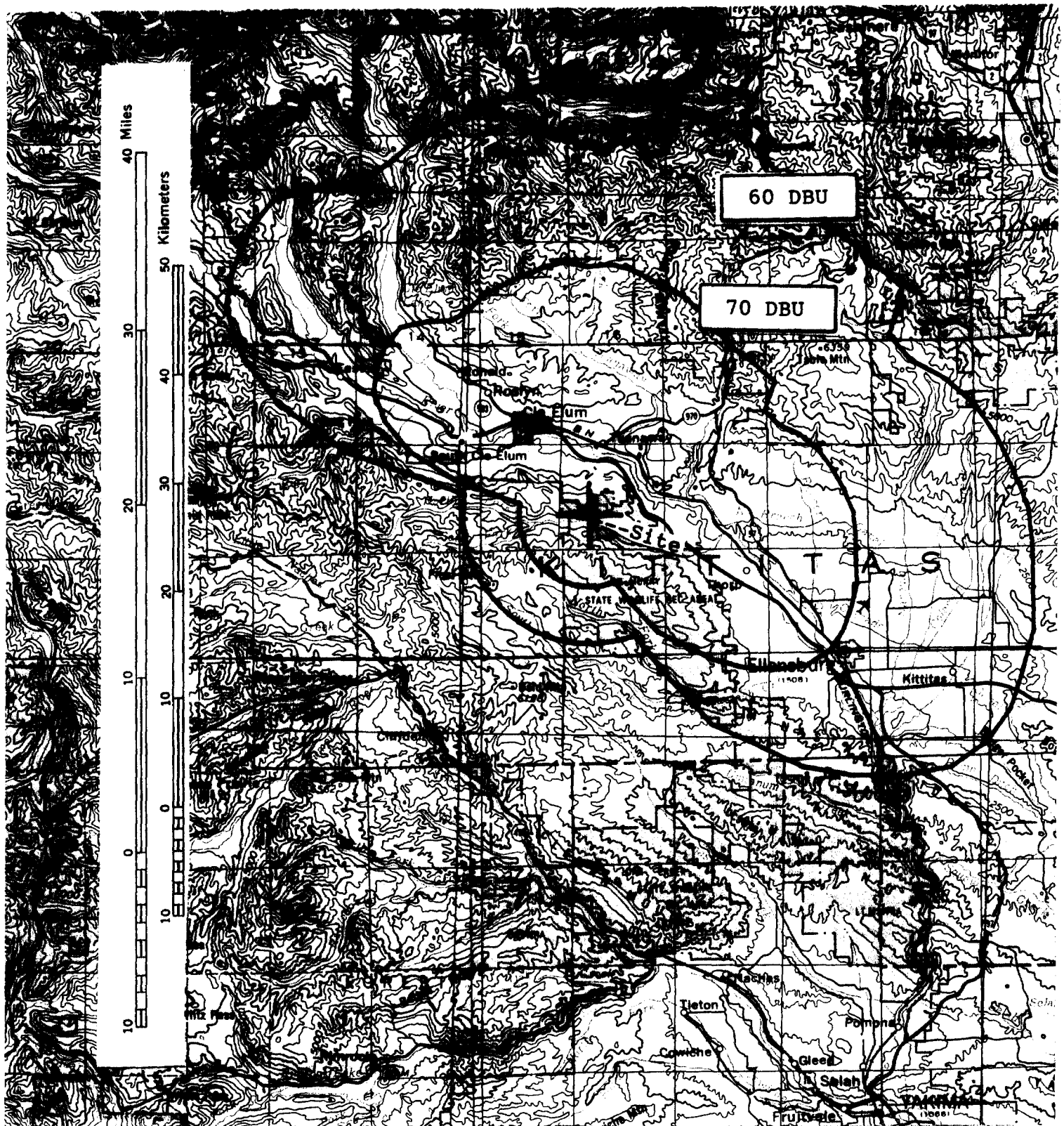
Azimuth in Deg.	Distance in km.	Elevation in meters
.0	16	718.4
45.0	16	783.4
90.0	16	665.5
135.0	16	794.2
180.0	16	1179.5
225.0	16	1360.6
270.0	16	1139.4
315.0	16	659.0
Eight Radial (3-16 km) Average 912.5 m. City radial is 315°		

Service Contours are based on
the following:

Antenna Center AMSL	1064 meters
Average Terrain	912 meters
Antenna HAAT	152 meters
Station ERP in DBK	3.1 DBK (2 KW)

Map of coverage shown as figure 5.
Tabulated coverage shown as figure 6.





KENNETH WILLIAMS, JR. P.E. - Consulting Engineer - Tacoma, WA

BRIAN J. LORD - CLE ELUM, WA - CHANNEL 229A - EXHIBIT No. 6

TABULATION OF CONTOUR DATA
USED TO PREPARE EXHIBIT No.5

Coordinates: N 47 7 36 W 120 50 41
F(50,50) Curves Number of Contours: 2

AZ (deg)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu):		AZ (deg)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS	
			70.0	60.0				70.0	60.0
.0	346	3.00	23.1	38.8	185.0	-158	3.00	6.7	12.0
5.0	355	3.00	23.4	39.3	190.0	-181	3.00	6.7	12.0
10.0	348	3.00	23.2	38.9	195.0	-211	3.00	6.7	12.0
15.0	331	3.00	22.6	38.0	200.0	-234	3.00	6.7	12.0
20.0	328	3.00	22.4	37.9	205.0	-264	3.00	6.7	12.0
25.0	317	3.00	22.1	37.3	210.0	-281	3.00	6.7	12.0
30.0	298	3.00	21.4	36.2	215.0	-284	3.00	6.7	12.0
35.0	292	3.00	21.2	35.9	220.0	-289	3.00	6.7	12.0
40.0	273	3.00	20.5	34.9	225.0	-297	3.00	6.7	12.0
45.0	281	3.00	20.8	35.3	230.0	-287	3.00	6.7	12.0
50.0	287	3.00	21.0	35.6	235.0	-283	3.00	6.7	12.0
55.0	300	3.00	21.4	36.3	240.0	-233	3.00	6.7	12.0
60.0	237	3.00	19.1	32.8	245.0	-153	3.00	6.7	12.0
65.0	250	3.00	19.6	33.5	250.0	-46	3.00	6.7	12.0
70.0	292	3.00	21.2	35.9	255.0	-13	3.00	6.7	12.0
75.0	327	3.00	22.4	37.8	260.0	-54	3.00	6.7	12.0
80.0	352	3.00	23.3	39.1	265.0	-55	3.00	6.7	12.0
85.0	375	3.00	24.1	40.3	270.0	-75	3.00	6.7	12.0
90.0	399	3.00	24.9	41.5	275.0	-149	3.00	6.7	12.0
95.0	409	3.00	25.2	42.0	280.0	1	3.00	6.7	12.0
100.0	420	3.00	25.5	42.5	285.0	115	3.00	13.2	23.6
105.0	438	3.00	26.1	43.4	290.0	213	3.00	18.1	31.2
110.0	441	3.00	26.2	43.5	295.0	295	3.00	21.3	36.1
115.0	447	3.00	26.3	43.8	300.0	359	3.00	23.5	39.5
120.0	436	3.00	26.0	43.2	305.0	385	3.00	24.4	40.8
125.0	401	3.00	24.9	41.6	310.0	403	3.00	25.0	41.7
130.0	338	3.00	22.8	38.4	315.0	405	3.00	25.1	41.8
135.0	270	3.00	20.4	34.7	320.0	366	3.00	23.8	39.8
140.0	208	3.00	17.8	30.9	325.0	327	3.00	22.4	37.8
145.0	142	3.00	14.7	26.0	330.0	327	3.00	22.4	37.8
150.0	106	3.00	12.7	22.7	335.0	341	3.00	22.9	38.5
155.0	56	3.00	9.2	16.3	340.0	344	3.00	23.0	38.7
160.0	19	3.00	6.7	12.0	345.0	348	3.00	23.2	38.9
165.0	3	3.00	6.7	12.0	350.0	359	3.00	23.5	39.5
170.0	-47	3.00	6.7	12.0	355.0	364	3.00	23.7	39.7
175.0	-82	3.00	6.7	12.0	360.0	346	3.00	23.1	38.8
180.0	-115	3.00	6.7	12.0					

KENNETH WILLIAMS, JR. P.E. - Consulting Engineer - Tacoma, WA